Dear FCC,

This comment is filed on behalf of ET docket 10165, reallocation of the 2300-2305 MHz band to Primary Amateur Radio.

I support the position of the American Radio Relay League (ARRL), and hereby incorporate their extensive comments by reference.

I would like to add some additional thoughts. I am an active user of this band segment, and have a significant amount of time and money invested in equipment for this band. The common use of this general area of spectrum is more and more short range data links of various sorts. Although these devices often use spread spectrum modulation to improve frequency re-use, the presence of large numbers of these devices in any area serve the raise the noise floor, both in their band of operation, and just outside of it.

On the other hand, hams are attempting long distance communication in this band. Distances commonly communicated over range from dozens to hundreds of miles. (Much more if you consider moonbounce, which is popular in this band segment.) Although commonly practiced, this kind of narrowband, long range terrestrial communication is still highly experimental. Many long-distance propagation modes at these frequencies are still poorly understood. As it is, moderately high transmit power, extremely directional antennas, and 'bleeding edge' state-of-the-art recievers are needed to communicate effectively at these frequencies.

Furthermore, the provision of the amateur allocation as a guard band to NASA uses just below the 2300-2305 MHz band is a good idea. Amateurs have sucessfully provided protective guard bands in other areas of the radio spectrum for several decades. Good examples are the 6 meter band, just below TV channel 2. Another is the amateur 5 GHz allocation just below the C band fixed and satellite uplink services at 5.925-6.425 GHz. Amateurs have been, and will continue to be good neighbors on these various 'guard band' allocations.

I will also mention that I filed comments on the previous proceeding on this spectrum, ET dockey 94-32. These comments were on behalf of the ROchester VHF Group.

To sum these comments up, I urge the FCC to take the biggest possible step they can take to making sure this important part of the amateur radio spectrum remains suitable for weak-signal work: Allocate it to amateur radio on a primary basis.

Respectfully submitted,
Tim Stoffel, NS9E